

REMARKS

Claims 1-5 and 8 remain pending in the present application. The Applicants respectfully request reexamination of the present application in view of the following comments.

Only one rejection is presented, applied to Claim 1. This rejection is virtually identical to a rejection set forth in the rejection of November 20, 2006 and subsequently withdrawn in the rejection of May 16, 2007.

Allowable Matter

The Official Action indicates that Claims 2-5 and 8 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicants thank the Examiner for indicating allowable material.

35 U.S.C. § 102

Claim 1 stands rejected under 35 USC § 102(e) as being allegedly unpatentable over Masleid (US 7,049,699, "Masleid"). Applicants have

reviewed the cited reference and respectfully assert that embodiments in accordance with the present invention as recited in Claim 1 are patentable over Masleid for the following reasons.

Applicants respectfully note that a virtually identical rejection under 35 USC § 102 was presented in the rejection of November 20, 2006. This rejection over Masleid was withdrawn in the subsequent rejection of May 16, 2007.

With respect to Claim 1, Applicants respectfully assert that Masleid fails to teach or suggest “a tile” as recited by Claim 1. In fact, Masleid fails to utilize the term “tile” or similar terms. The plan view elements illustrated, particularly the cited Figures 5A and 5B, illustrate relatively large portions of an integrated circuit. Applicants respectfully assert that one of ordinary skill in the art would not understand Figures 5A and/or 5B, nor any other portion of Masleid, to teach or suggest the recited “tiles.”

Applicants respectfully assert that Masleid is directed to semiconductor structures, rather than methods of designing such structures, as recited by Claim 1. Consequently, Masleid is completely silent as to a method of producing a design, even of producing designs for embodiments of Masleid. Consequently, Masleid is absolutely silent as to the recited “tile” as recited by Claim 1.

For these additional reasons, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Further with respect to Claim 1, as Masleid is silent as to the recited “tile,” Masleid does not teach or suggest the further limitations of “a tile comprising a first layer wherein said first layer comprises a first layer element for a deep N-well pattern” or “arranging multiple instances of said tile” or “a tile array” or “merging said tiles” as recited by Claim 1. Moreover, Masleid fails to disclose that multiple instances of Figures 5A and/or 5B may be “tiled” to form an array covering a portion of said integrated circuit design, as recited by Claim 1.

For these further reasons, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Still further with respect to Claim 1, Applicants respectfully assert that Masleid fails to teach or suggest “merging said tiles to produce a deep N-well pattern” as recited by Claim 1. In addition to failing to teach or suggest a “tile,” as previously presented, Masleid fails to teach or suggest “merging” tiles to

produce a pattern. For example, Masleid fails to suggest that the pattern 500 is formed by merging tiles.

For this still further reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

CONCLUSION

Claims 1-5 and 8 remain pending in the present application. The Applicants respectfully request reexamination of the present application in view of the remarks presented herein.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 504160.

Respectfully submitted,

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